

LA10T – Privacy Policy

This Privacy Policy describes how LA10T (“LA10T”, pronounced “Latent”) collects, uses, processes, stores, discloses and protects personal data in connection with the LA10T platform, including its website, mobile applications, dashboards, AssetStore, Marketplace, Community Drive programmes, Social Community features and related services (collectively, the “Platform”).

For the purposes of this Agreement, “LA10T”, “we”, “us”, and “our” refer to the operator of the Platform.

1. Scope of Application

This Privacy Policy applies to all individuals and entities who access, interact with or use the Platform, including but not limited to:

- Website visitors
- Mobile application users
- Registered account holders
- AssetStore participants (including givers and receivers)
- Marketplace buyers and Affiliated Partners
- Community Drive participants and programme sponsors
- Ambassadors and content contributors
- Enterprise and government clients

This Policy applies whether you are acting in your personal capacity or on behalf of an organisation.

Where LA10T processes personal data on behalf of enterprise clients or programme sponsors, such processing may also be governed by separate contractual arrangements, including a Data Processing Addendum.

2. Definitions

For the purposes of this Privacy Policy:

“Personal Data” means any information that identifies, relates to, describes or can reasonably be associated with an identified or identifiable individual, as defined under applicable data protection laws.

“Processing” means any operation performed on Personal Data, whether automated or manual, including collection, recording, organisation, structuring, storage, adaptation, retrieval, use, disclosure, transmission, alignment, restriction, deletion or destruction.

“User” means any individual who accesses or uses the Platform, whether as a visitor, registered account holder, participant or contributor.

“Affiliated Partner” means any brand, merchant, organisation or entity approved to list or participate in the Marketplace or other Platform modules.

“Enterprise Client” means an organisation, company, institution or governmental body that engages LA10T under a commercial or programme agreement.

“AssetStore” means the circular reuse and exchange module of the Platform enabling listing and transfer of pre-owned items.

“Marketplace” means the curated sustainability-aligned product module operated within the Platform.

“Community Drive” means structured participation programmes, campaigns or initiatives conducted within the Platform.

“MRV” (Monitoring, Reporting, and Verification) means the Platform’s structured methodology used to validate participation events and determine eligibility for impact recognition.

“EcoCoin” means the Platform’s utility-based digital recognition mechanism issued upon verified avoided impact in accordance with MRV criteria.

“Platform” means the LA10T digital infrastructure, including its website, mobile applications, dashboards, modules and related services.

“Applicable Law” means any law, regulation or regulatory requirement governing the processing of Personal Data in relevant jurisdictions, including the Malaysian Personal Data Protection Act 2010 (PDPA).

3. Categories of Personal Data Collected

LA10T may collect and process the following categories of Personal Data, depending on how you interact with the Platform:

3.1 Identity Data

Information that identifies you, including:

- Full name
- Username or display name
- Profile photograph (if provided)

- Organisation or affiliation (where applicable)

3.2 Contact Data

Information used to communicate with you, including:

- Email address
- Contact number (if provided)
- Mailing address (where required for transactions)

3.3 Account Data

Information associated with your Platform account, including:

- Login credentials (stored in secure, encrypted form)
- Account preferences
- Subscription status
- EcoCoin balance and ledger references

3.4 Participation Data

Data generated through your activities on the Platform, including:

- Scan events
- AssetStore listings and transfer confirmations
- Marketplace purchase confirmations
- Community Drive participation records
- Role attribution (e.g., giver or receiver)
- Timestamped activity logs

Participation data may be used in MRV processes to determine eligibility for impact recognition.

3.5 Transaction Data

Where applicable:

- Payment confirmation records
- Order identifiers
- Redemption confirmations
- Dispute or refund records

Financial payment details are processed by authorised third-party payment service providers and are not stored directly by LA10T unless expressly stated.

3.6 Technical Data

Information automatically collected when you access the Platform, including:

- IP address
- Device type and operating system
- Browser type
- Application version
- Usage logs
- Session identifiers
- Crash reports

3.7 User-Generated Content

Content voluntarily submitted through Social Community features, including:

- Posts and comments
- Uploaded images
- Feedback and messages
- Campaign-related submissions

3.8 Location Data

Depending on your device settings and participation activities, LA10T may collect and process location-related information, which may include:

- Approximate geographic location (such as city or region)
- Country-level location derived from IP address
- Location data associated with scan events, AssetStore transfers or Marketplace transactions
- Programme participation region for Community Drive activities

Location data may be used for:

- MRV validation
- Prevention of duplicate or fraudulent activity
- Regional baseline modelling
- Programme-level analytics
- Compliance with jurisdictional requirements

Precise GPS location data will only be collected where permitted by your device settings and applicable law.

4. Participation and Impact Data

In addition to general account and technical data, LA10T processes participation and impact-related data generated through user activities on the Platform.

4.1 Participation Records

Participation data may include:

- Scan capture events
- AssetStore listings and transfer confirmations
- Marketplace purchase confirmations
- Community Drive programme engagement
- Timestamped activity logs
- Role designation (e.g., giver, receiver, participant)

Participation records reflect engagement activity and do not automatically constitute verified environmental impact.

4.2 Impact Recognition Data

Where participation activities satisfy the Platform's Monitoring, Reporting and Verification (MRV) criteria, additional data may be generated, including:

- Category classification
- Baseline comparison modelling
- Avoided impact calculations
- Impact attribution records
- EcoCoin issuance references

Impact recognition is based on predefined system boundaries and methodological assumptions and is recorded within the Platform's impact ledger.

4.3 Ledger and Traceability Records

The Platform may maintain ledger-based records of:

- Verified participation events
- EcoCoin issuance and retirement
- Impact recognition status
- Transactional confirmations

Ledger entries are maintained for traceability, integrity and audit-support purposes within the Platform ecosystem.

4.4 Methodological Integrity

Participation and impact data are processed in accordance with LA10T's proprietary MRV framework. Methodologies, baselines, datasets and verification logic may evolve over time to improve accuracy and integrity.

5. Automatically Collected Technical Data

When you access or use the Platform, certain technical information may be collected automatically to ensure system functionality, security and performance.

This may include:

- IP address
- Device identifiers (such as device ID or advertising ID, where permitted)
- Device type and operating system
- Browser type and version
- Application version
- Session logs and usage activity
- Access timestamps
- Crash reports and diagnostic data
- Cookie identifiers and similar tracking technologies

5.1 Purpose of Technical Data Collection

Technical data may be used for:

- Maintaining platform security and integrity
- Detecting fraud, abuse or unauthorised access
- Monitoring system performance
- Troubleshooting errors and crashes
- Improving user experience
- Supporting analytics and service optimisation

Technical data may be combined with participation data where necessary to enforce MRV controls, prevent duplicate activity, or maintain platform integrity.

6. Data Collected from Third Parties

LA10T may receive personal data from third parties in connection with the operation of the Platform and related programmes.

Such third parties may include:

6.1 Payment Service Providers

Where transactions occur through AssetStore or Marketplace modules, authorised payment processors may provide transaction confirmation data, payment status indicators and limited billing-related information.

LA10T does not receive or store full payment card details unless expressly stated.

6.2 Affiliated Partners

Affiliated Partners participating in the Marketplace or programme initiatives may provide data necessary to:

- Confirm purchases or redemptions
- Validate eligibility for participation
- Support impact recognition under baseline comparison models

Partners are responsible for ensuring that any personal data shared with LA10T has been collected in compliance with applicable data protection laws.

6.3 Enterprise Programme Sponsors

Enterprise clients or programme sponsors may provide participant lists, campaign eligibility data or organisational participation records in connection with structured deployments of the Platform.

Where LA10T processes such data on behalf of an enterprise client, processing may be governed by a separate Data Processing Addendum (DPA).

6.4 Government-Linked Campaigns

Where the Platform is deployed in collaboration with public-sector entities, limited participant or programme data may be received for the purposes of:

- Eligibility validation
- Participation tracking
- Aggregated programme reporting

Such data is processed in accordance with applicable legal and contractual requirements.

6.5 Data Accuracy and Responsibility

LA10T relies on third parties to provide accurate and lawfully obtained information. LA10T is not responsible for errors, omissions or unlawful collection practices by third parties.

7. Purposes of Processing

LA10T processes Personal Data for legitimate operational, technical, analytical and compliance purposes in connection with the Platform. These purposes may include:

7.1 Account Management

- Creating and maintaining user accounts
- Authenticating user access
- Managing subscriptions and preferences
- Providing customer support

7.2 Platform Functionality

- Enabling scan capture and participation tracking
- Operating AssetStore and Marketplace modules
- Facilitating Community Drive programmes
- Enabling Social Community interactions

7.3 Monitoring, Reporting and Verification (MRV)

- Validating participation events
- Confirming transaction completion
- Role attribution (giver / receiver)
- Enforcing system boundaries
- Preventing duplicate impact recognition
- Supporting baseline comparison modelling

7.4 Impact Recognition and EcoCoin Issuance

- Calculating avoided environmental impact
- Recording impact recognition
- Issuing EcoCoin upon verified events
- Maintaining ledger traceability and audit-support records

7.5 Fraud Prevention and Integrity Controls

- Detecting manipulation or artificial inflation of activity
- Identifying duplicate accounts or suspicious behaviour
- Protecting users and partners from misuse

7.6 Security Monitoring

- Protecting system integrity
- Preventing unauthorised access
- Monitoring technical anomalies
- Investigating potential breaches

7.7 Analytics and Platform Improvement

- Analysing usage patterns
- Improving feature performance
- Enhancing user experience
- Developing aggregated benchmarking insights

Aggregated and anonymised data may be used for research, reporting or service optimisation.

7.8 Legal and Regulatory Compliance

- Complying with applicable laws and regulatory obligations
- Responding to lawful requests from authorities
- Enforcing contractual rights

8. Legal Basis for Processing

Where required by applicable data protection laws, LA10T processes Personal Data on one or more of the following legal bases:

8.1 Consent

Where you have provided clear consent for specific processing activities, including:

- Account registration
- Participation in programmes
- Optional location data (where applicable)
- Marketing communications (where permitted)

You may withdraw consent at any time, subject to legal or contractual limitations.

8.2 Contractual Necessity

Where processing is necessary to:

- Create and manage your account
- Provide Platform features and services
- Process participation events
- Conduct MRV validation
- Issue EcoCoin following verified activity
- Facilitate AssetStore or Marketplace transactions

8.3 Legal Obligation

Where processing is necessary to comply with applicable laws, including:

- Data protection regulations
- Financial or tax obligations (where applicable)
- Lawful requests from authorities

8.4 Legitimate Interests

Where processing is necessary for LA10T's legitimate interests, provided such interests are not overridden by your rights, including:

- Maintaining platform security and integrity
- Preventing fraud and abuse
- Improving Platform functionality
- Conducting analytics and benchmarking
- Protecting LA10T's legal rights

Important Clarification

LA10T does not process Personal Data for automated decision-making that produces legal or similarly significant effects without appropriate safeguards.

9. Controller and Processor Roles

The role of LA10T in processing Personal Data depends on the nature of the interaction and the context in which the Platform is used.

9.1 LA10T as Data Controller

LA10T acts as a data controller where it determines the purposes and means of processing Personal Data, including in relation to:

- Individual user account registration and management
- Platform-wide participation tracking
- Monitoring, Reporting, and Verification (MRV) processes
- Impact recognition and EcoCoin issuance
- Fraud prevention and security monitoring

- Platform analytics and improvement

In such cases, LA10T is responsible for ensuring that Personal Data is processed in accordance with applicable data protection laws.

9.2 LA10T as Data Processor

Where the Platform is deployed by an enterprise client, institutional partner or programme sponsor and LA10T processes Personal Data on their behalf in accordance with their instructions, LA10T may act as a data processor. This may include:

- Processing participant lists provided by enterprise clients
- Supporting employer-based or organisation-based participation programmes
- Generating programme-level analytics and reports

In such cases, processing may be governed by a separate Data Processing Addendum (DPA) or enterprise agreement defining responsibilities and obligations.

9.3 Shared Responsibility Contexts

In certain modules, including Marketplace and Community Drive, LA10T and Affiliated Partners or programme sponsors may act as independent data controllers in relation to their respective processing activities.

Each party is responsible for complying with applicable data protection laws in relation to the Personal Data it controls.

10. AssetStore Data Processing

Where you participate in the AssetStore module, LA10T may process Personal Data and participation records for the purpose of facilitating circular reuse activities and determining eligibility for impact recognition.

10.1 Transfer Confirmations

LA10T may process data relating to:

- Listing of pre-owned items
- Acceptance or adoption by another user
- Confirmation of transfer, exchange, donation or sale
- Timestamped completion records

Transfer confirmation is required for verification under the Platform's MRV framework.

10.2 Role Validation (Giver / Receiver)

To support structured impact attribution, LA10T may process role-based data identifying whether a user acts as:

- Giver (disposing or transferring an item)
- Receiver (acquiring or adopting an item)

Role validation is used to allocate impact recognition within defined system boundaries and to prevent duplicate attribution.

10.3 Reuse Impact Attribution

Where MRV criteria are satisfied, LA10T may process data necessary to:

- Apply category classification
- Determine baseline comparison
- Attribute disposal avoidance recognition to the giver
- Attribute avoided manufacturing recognition to the receiver
- Record EcoCoin issuance references

Impact recognition is participation-based and platform-specific and does not constitute regulatory carbon accounting.

10.4 Integrity Controls

AssetStore data may be analysed to:

- Detect duplicate listings
- Identify artificial inflation of reuse events
- Prevent manipulation or fraudulent confirmations
- Enforce system boundaries

LA10T reserves the right to withhold or adjust recognition where inconsistencies are detected.

11. Marketplace Data Processing

Where you engage with the Marketplace module, LA10T may process Personal Data and transaction-related information for the purpose of validating purchases and determining eligibility for impact recognition.

11.1 Purchase Validation

LA10T may process data relating to:

- Order confirmations
- Transaction identifiers
- Product category classification
- Purchase timestamps
- Confirmation of completion or fulfilment

Purchase validation is required to determine whether an activity qualifies for impact recognition under the Platform's MRV framework.

11.2 Baseline Differential Calculation

Where applicable, LA10T may process data necessary to:

- Classify the purchased product within a defined category
- Apply predefined conventional category baselines
- Compare disclosed or referenced product impact profiles against baseline benchmarks
- Determine differential avoided impact within established system boundaries

Baseline comparison modelling is conducted using predefined datasets and methodological assumptions as described in Platform documentation.

11.3 EcoCoin Issuance

Where MRV criteria are satisfied, LA10T may process data to:

- Record verified avoided impact
- Issue EcoCoin within the Platform ledger
- Maintain traceability of recognition status

Participation or purchase alone does not guarantee EcoCoin issuance.

11.4 Integrity and Compliance Controls

Marketplace data may be analysed to:

- Detect manipulation, artificial activity or duplicate claims
- Validate partner-provided product information
- Enforce system boundaries
- Maintain ledger integrity

Impact recognition within the Marketplace is participation-based and platform-specific and does not constitute certified carbon credits, regulatory offsets or independent ESG verification.

12. Community Drive Programme Data

Where you participate in Community Drive programmes, campaigns or structured initiatives conducted through the Platform, LA10T may process Personal Data and participation records for programme administration and impact tracking purposes.

12.1 Participation Tracking

LA10T may process data relating to:

- Programme registration and eligibility
- Activity completion status
- Scan events associated with campaign rules
- Participation milestones
- Timestamped activity logs
- EcoCoin issuance linked to verified programme activities

Participation data may be used to determine whether campaign criteria have been satisfied under the Platform's MRV framework.

12.2 Campaign-Level Analytics

LA10T may generate programme-level analytics including:

- Participation rates
- Activity completion metrics
- Impact recognition summaries
- Regional distribution trends
- Aggregated behavioural insights

Such analytics may be shared with enterprise clients, programme sponsors or institutional partners in aggregated or anonymised form.

12.3 Aggregated Programme Reporting

For structured enterprise or government-linked deployments, LA10T may prepare aggregated reports summarising:

- Total verified participation
- Avoided impact recognition within defined system boundaries
- EcoCoin issuance statistics
- Campaign performance indicators

Individual-level data will not be disclosed to sponsors except where:

- Explicit consent has been obtained; or
- Required under a contractual arrangement; or
- Permitted by applicable law.

12.4 Role of LA10T

LA10T operates Community Drive as a digital participation infrastructure and does not act as a regulatory auditor, certifier or compliance authority for programme sponsors.

13. Social Community Data

Where you engage with Social Community features of the Platform, LA10T may process Personal Data and User Content submitted through such features.

13.1 User-Generated Content

LA10T may process content voluntarily submitted by users, including:

- Posts and comments
- Uploaded images or media
- Feedback and discussions
- Campaign-related submissions
- Public profile information

User Content may be visible to other users depending on Platform settings.

13.2 Moderation Records

To maintain platform integrity and compliance, LA10T may process data relating to:

- Content review actions
- Account warnings or restrictions
- Content removal decisions
- Policy enforcement records

Moderation actions may be recorded to ensure consistency and legal compliance.

13.3 Content Reporting Logs

Where users report content or behaviour, LA10T may process:

- Reporter identity (where not anonymous)
- Details of reported content
- Investigation records

- Outcome determinations

Such records may be retained for audit-support and compliance purposes.

13.4 Public Visibility and Responsibility

Users are responsible for the content they choose to make publicly available. LA10T does not endorse User Content and may remove or restrict content that violates Platform policies or applicable law.

13.5 Impact-Related Claims in Community Content

User-generated sustainability claims or representations do not constitute verified impact unless separately validated under the Platform's MRV framework.

14. Data Sharing and Disclosure

LA10T does not sell Personal Data. Personal Data may be shared only where necessary for legitimate operational, contractual or legal purposes.

14.1 Service Providers

LA10T may share Personal Data with authorised third-party service providers who assist in:

- Platform hosting and infrastructure management
- Data storage and cloud services
- Analytics and performance monitoring
- Security monitoring and fraud detection
- Customer support services

Such providers are contractually required to process Personal Data only in accordance with LA10T's instructions and applicable data protection laws.

14.2 Cloud Hosting Providers

Personal Data may be stored and processed on secure cloud infrastructure operated by reputable hosting providers. Data may be processed in jurisdictions outside Malaysia, subject to appropriate safeguards.

14.3 Payment Processors

Where transactions occur through AssetStore or Marketplace modules, Personal Data may be shared with authorised payment service providers for:

- Payment processing
- Transaction confirmation
- Fraud prevention

LA10T does not store full payment card information unless expressly stated.

14.4 Enterprise Clients and Programme Sponsors

In enterprise or Community Drive deployments, aggregated or anonymised participation and impact data may be shared with enterprise clients, programme sponsors or institutional partners.

Individual-level Personal Data will only be shared:

- Where required under a contractual arrangement
- Where the individual has provided explicit consent
- Where permitted or required by applicable law

14.5 Legal and Regulatory Authorities

LA10T may disclose Personal Data where required to:

- Comply with applicable law
- Respond to lawful governmental or regulatory requests
- Protect legal rights
- Prevent fraud or unlawful activity

14.6 Business Transfers

In the event of a merger, acquisition, restructuring or asset transfer, Personal Data may be transferred as part of the transaction, subject to appropriate confidentiality safeguards.

15. Cross-Border Transfers

LA10T operates from Malaysia, but Personal Data may be processed, stored or accessed in jurisdictions outside Malaysia where our service providers, infrastructure partners or affiliated entities operate.

Where Personal Data is transferred across borders, LA10T will take reasonable steps to ensure that such transfers are conducted in accordance with applicable data protection laws and subject to appropriate safeguards.

Such safeguards may include:

- Contractual protections with service providers
- Access control measures
- Encryption and security standards
- Internal data protection policies

By using the Platform, you acknowledge that Personal Data may be transferred to and processed in jurisdictions that may have data protection laws different from those of your country of residence.

Where required by applicable law, LA10T will obtain necessary consent or implement additional protective measures prior to cross-border transfer.

16. Data Retention

LA10T retains Personal Data only for as long as necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by applicable law.

16.1 Retention Based on Purpose

Personal Data may be retained for purposes including:

- Account administration and user support
- Operation of Platform features
- Monitoring, Reporting, and Verification (MRV) processes
- Impact recognition and EcoCoin issuance
- Fraud prevention and system integrity
- Compliance with legal or regulatory obligations
- Dispute resolution and enforcement of contractual rights

Retention periods may vary depending on the nature of the data and the applicable legal or operational requirement.

16.2 MRV Audit Traceability

Participation records, verification outcomes and EcoCoin issuance references may be retained for audit-support, traceability and system integrity purposes within the Platform ecosystem.

Such retention supports:

- Prevention of duplicate impact recognition
- Historical verification integrity
- Programme-level reporting
- Fraud detection and investigation

16.3 Account Deactivation and Deletion

Where a user deletes their account or requests deletion of Personal Data:

- LA10T will take reasonable steps to remove or anonymise Personal Data, subject to legal, contractual and audit requirements.
- Certain records may be retained where necessary to maintain ledger integrity, prevent fraud or comply with legal obligations.

16.4 Aggregated and Anonymised Data

Aggregated, de-identified or anonymised data that no longer identifies an individual may be retained indefinitely for research, benchmarking, analytical or system improvement purposes.

17. Data Security Measures

LA10T implements reasonable administrative, technical and organisational measures designed to protect Personal Data against unauthorised access, disclosure, alteration, loss or destruction.

17.1 Encryption

Where appropriate, Personal Data is protected through:

- Encryption in transit (such as secure transport protocols)
- Encryption at rest for sensitive data categories
- Secure credential handling and hashing mechanisms

17.2 Access Control

Access to Personal Data is restricted based on role and operational necessity. Measures may include:

- Role-based access controls
- Multi-factor authentication (where applicable)
- Privileged access monitoring
- Periodic access reviews

17.3 Segregation of Duties

LA10T applies internal controls to ensure appropriate separation between development, operational and administrative access functions in order to reduce risk of unauthorised data exposure.

17.4 Monitoring and Integrity Controls

Systems may include:

- Activity logging
- Anomaly detection
- Fraud detection mechanisms
- Monitoring of suspicious or irregular behaviour

These measures support Platform integrity, MRV accuracy and prevention of duplicate or manipulated participation records.

17.5 Incident Response Protocols

LA10T maintains internal incident response procedures to address potential data security incidents.

Where required by applicable law, LA10T will notify affected individuals and/or relevant authorities in accordance with legal obligations.

17.6 Limitations

While LA10T implements reasonable safeguards, no system can guarantee absolute security. Users are responsible for maintaining the confidentiality of their account credentials.

18. Data Integrity and Accuracy

LA10T takes reasonable steps to ensure that Personal Data processed through the Platform is accurate, relevant and not misleading in relation to the purposes for which it is used.

18.1 User Responsibility

Users are responsible for ensuring that:

- Information submitted to the Platform is accurate and complete
- Participation records reflect genuine activity
- AssetStore listings are truthful
- Marketplace-related representations are not misleading

LA10T is not responsible for inaccuracies arising from false, incomplete or misleading information submitted by users, Affiliated Partners or programme sponsors.

18.2 Correction Mechanisms

Users may request correction of inaccurate or outdated Personal Data through official Platform channels.

Where data forms part of verified participation or MRV records, corrections may be subject to:

- Verification procedures
- System integrity checks
- Audit-trace preservation requirements

LA10T may retain historical records where necessary to preserve ledger integrity, prevent fraud or comply with legal obligations.

18.3 Impact-Related Data Integrity

Impact recognition and EcoCoin issuance are based on participation data provided by users and validated under the Platform's MRV framework. Incorrect or manipulated submissions may result in:

- Adjustment of recognition records
- Revocation of EcoCoin
- Account suspension

19. User Rights

Subject to applicable data protection laws, you may have certain rights in relation to your Personal Data.

19.1 Right of Access

You may request access to Personal Data held about you and obtain information regarding:

- The categories of data processed
- The purposes of processing
- The categories of recipients to whom data may be disclosed

19.2 Right to Correction

You may request correction of inaccurate or incomplete Personal Data.

Where data forms part of verified participation records, MRV outcomes or ledger entries, corrections may be subject to verification procedures and system integrity safeguards.

19.3 Right to Deletion

You may request deletion of Personal Data where:

- The data is no longer necessary for the purposes for which it was collected;
- You withdraw consent and no other legal basis applies;
- Processing is unlawful.

Certain records may be retained where necessary for:

- Legal compliance
- Dispute resolution
- Fraud prevention
- Preservation of ledger integrity and audit traceability

19.4 Right to Withdraw Consent

Where processing is based on consent, you may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing conducted prior to withdrawal.

19.5 Right to Object

Where permitted by applicable law, you may object to processing based on legitimate interests.

LA10T may continue processing where compelling legitimate grounds exist, including fraud prevention, platform integrity or legal compliance.

19.6 Exercise of Rights

Requests to exercise data rights may be submitted through official support channels.

LA10T may require reasonable verification of identity before processing requests.

20. Children and Minors

The Platform is not directed at children below the age of thirteen (12) or the minimum age required under applicable law in the relevant jurisdiction.

Users under the age of eighteen (18) may access and use the Platform for educational and awareness purposes only, subject to parental or legal guardian consent where required by applicable law.

20.1 Parental Consent

Where required, parents or legal guardians are responsible for:

- Supervising the minor's use of the Platform

- Providing consent for account registration
- Monitoring participation activities

LA10T may request verification of parental consent where appropriate.

20.2 Educational Use Limitation

Minor users may:

- Participate in educational programmes
- View participation metrics
- Engage in awareness-based activities

Certain features, including Marketplace transactions or AssetStore exchanges involving payment, may be restricted for minors.

20.3 Unauthorised Collection

If LA10T becomes aware that Personal Data has been collected from a minor without required consent, LA10T will take reasonable steps to delete such data.

21. Cookies and Tracking Technologies

LA10T may use cookies and similar tracking technologies to enhance functionality, improve performance and analyse usage of the Platform.

Cookies are small text files stored on your device that enable recognition of your browser or device.

21.1 Functional Cookies

Functional cookies are necessary for core Platform operations, including:

- User authentication
- Session management
- Security controls
- Load balancing and performance optimisation

These cookies are required for the Platform to function properly.

21.2 Analytics Cookies

Analytics cookies may be used to:

- Measure usage patterns
- Understand feature engagement
- Monitor performance and system health
- Improve user experience

Analytics data may be aggregated and anonymised where possible.

21.3 Consent Management

Where required by applicable law, users may:

- Accept or reject non-essential cookies
- Adjust cookie preferences through browser settings or consent tools

Disabling certain cookies may affect Platform functionality.

21.4 Similar Technologies

The Platform may also use:

- Local storage mechanisms
- SDK-based tracking (for mobile applications)
- Device identifiers where permitted

Such technologies are used for security, analytics and functionality purposes.

22. AI and Automated Processing

LA10T may use algorithmic models, automated classification systems and analytical tools to support Platform functionality, including participation tracking and impact recognition.

22.1 Classification Logic

Automated systems may be used to:

- Categorise products, items or activities
- Map activities to predefined baseline categories
- Assign role-based attributes (e.g., giver or receiver)
- Detect anomalous or duplicate activity patterns

These processes support Monitoring, Reporting, and Verification (MRV) functions.

22.2 Baseline Modelling

Automated modelling tools may be used to:

- Apply conventional category benchmarks
- Calculate baseline differential outcomes
- Estimate avoided impact within defined system boundaries
- Determine eligibility for EcoCoin issuance

Such modelling is based on predefined datasets and methodological assumptions.

22.3 Automated Verification Decisions

Certain participation events may be validated through automated systems without manual review, including:

- Confirmation of transaction completion
- Role validation
- Baseline comparison outcomes
- EcoCoin issuance triggers

Automated processing is designed to maintain platform integrity and consistency.

22.4 No Solely Automated Legal Effect

LA10T does not use automated decision-making that produces legal effects or similarly significant consequences for users without appropriate safeguards.

Impact recognition and EcoCoin issuance are participation-based recognition mechanisms and do not constitute financial, regulatory or legal determinations.

22.5 Model Refinement

LA10T may update, refine or improve algorithmic models and baseline datasets over time to enhance accuracy and integrity.

23. EcoCoin and Ledger Data

LA10T maintains records relating to participation-based impact recognition within the Platform, including EcoCoin issuance and associated ledger entries.

23.1 Participation-Based Recognition Records

Where participation activities satisfy MRV criteria, LA10T may generate and store records including:

- Verified participation confirmations
- Impact recognition references
- EcoCoin issuance identifiers
- EcoCoin retirement or redemption references
- Timestamped ledger entries

Such records are maintained for traceability, integrity and audit-support purposes within the Platform ecosystem.

23.2 Non-Financial Classification

EcoCoin is a utility-based digital recognition mechanism and does not constitute:

- A financial instrument
- A security
- A carbon credit

- A regulatory compliance unit
- A payment instrument
- An investment product

EcoCoin balances and ledger records reflect platform-specific participation recognition only.

23.3 Traceability and Ledger Integrity

The Platform may maintain structured ledger records, including distributed or database-based traceability systems, for the purposes of:

- Preventing duplicate recognition
- Maintaining historical verification integrity
- Supporting programme-level reporting
- Detecting manipulation or fraudulent activity

Ledger data may be retained in accordance with the Data Retention provisions of this Privacy Policy.

23.4 No Custodial Function

LA10T does not operate as a financial custodian, digital asset exchange or regulated payment institution in relation to EcoCoin.

Ledger records serve recognition and traceability purposes only.

24. Third-Party Links and Integrations

The Platform may contain links to third-party websites, services or applications and may integrate with third-party tools, infrastructure providers, payment processors, analytics services or Affiliated Partner systems.

24.1 External Websites

Where you access external websites or services through links provided on the Platform, you acknowledge that such sites operate independently from LA10T.

LA10T does not control and is not responsible for:

- The privacy practices of third-party websites
- The content or accuracy of third-party materials
- The security or data handling practices of external services

Users are encouraged to review the privacy policies of any third-party site before providing personal data.

24.2 Integrated Services

The Platform may rely on third-party infrastructure or service providers to deliver certain features, including:

- Payment processing
- Cloud hosting
- Analytics and monitoring
- Identity verification (where applicable)
- Delivery services

Such integrations may involve the processing of Personal Data in accordance with contractual arrangements and applicable law.

24.3 No Endorsement

Inclusion of a link, integration or reference to a third-party service does not constitute endorsement, certification or approval by LA10T.

25. Data Breach Handling

LA10T maintains internal incident response procedures designed to identify, assess, contain and remediate potential data security incidents involving Personal Data.

25.1 Incident Response Procedures

In the event of a suspected or confirmed data security incident, LA10T may:

- Activate internal response protocols
- Investigate the nature and scope of the incident
- Implement containment and remediation measures
- Assess potential risks to affected individuals
- Enhance safeguards to prevent recurrence

25.2 Regulatory Notification

Where required by applicable law, LA10T will notify:

- Relevant regulatory authorities; and/or
- Affected individuals

within the timeframes prescribed by law.

Notification decisions will consider:

- The nature of the data involved
- The severity and likelihood of harm
- Legal and regulatory obligations

25.3 Cooperation

Where appropriate, LA10T may cooperate with enterprise clients, programme sponsors or relevant authorities in connection with investigation or remediation of data security incidents.

25.4 Limitations

While LA10T implements reasonable safeguards and response procedures, no system can guarantee absolute security.

26. Changes to This Privacy Policy

LA10T may update or modify this Privacy Policy from time to time to reflect changes in:

- Platform features or functionality
- Legal or regulatory requirements
- Data processing practices
- Security standards or operational procedures

26.1 Update Mechanism

Updated versions of this Privacy Policy will be published on the Platform with a revised “Last Updated” date.

Where changes are material, LA10T may provide additional notice through the Platform or other appropriate communication channels.

26.2 Effective Date

Changes to this Privacy Policy take effect upon publication or on the effective date specified in the updated version.

Your continued use of the Platform after the effective date constitutes acknowledgement of the updated Privacy Policy.

If you do not agree with the revised terms, you should discontinue use of the Platform.

27. Complaints and Regulatory Contact

If you have concerns about how your Personal Data has been processed, you may first contact LA10T through the official support channels published on the Platform. We will use reasonable efforts to investigate and respond within a commercially reasonable timeframe.

Where you believe that your data protection rights have been violated, you may have the right to lodge a complaint with the relevant data protection authority in your jurisdiction.

For users in Malaysia, this may include lodging a complaint with the Personal Data Protection Commissioner under the Malaysian Personal Data Protection Act 2010 (PDPA).

For users outside Malaysia, complaints may be submitted to the competent supervisory authority in your country of residence, where applicable.

28. Contact Information

For enquiries relating to this Privacy Policy, the processing of Personal Data or the exercise of your data protection rights, you may contact LA10T through the official support channels published on the Platform.

Where required for formal legal or regulatory purposes, written communications may be submitted to the contact details designated on the Platform or to such updated address as LA10T may specify from time to time.

LA10T will use reasonable efforts to respond to privacy-related enquiries within a commercially reasonable timeframe.